

EXHIBIT 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LACI N. BLANCHARD,
Individually, and as
next friend of W.B.,
surviving minor child of
RONNIE P. BLANCHARD,
JR.,

Plaintiff, Civil Action No.
22-CV-2420

vs.
SANARE ENERGY PARTNERS
LLC, et al.,
Defendants.

REMOTE ORAL AND VIDEOTAPED DEPOSITION OF
LANCE RODRIGUE
July 18, 2025
11:01 a.m.

ORAL AND VIDEOTAPED DEPOSITION of LANCE
RODRIGUE, produced as a witness at the instance of
the Plaintiff, and duly sworn, was taken in the
above-styled and numbered cause on July 14, 2025,
from 11:01 a.m. to 12:56 p.m., before LaRita J.
Cormier, CSR, in and for the Federal Rules of Civil
Procedure, reported by machine shorthand, taken by
REMOTE VIDEO CONFERENCE, pursuant to the Federal
Rules of Civil Procedure and the provisions stated
on the record or attached hereto.

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19 Also present:

20 Audrey Bowen, Legal Video Specialist
21
22
23
24
25

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1 sad face is -- is just thinking about this incident
2 brings up those emotions that you experienced on
3 March 25th, 2022; right?

4 A. Yes, sir.

5 Q. And I would imagine some of the emotions
6 that you experienced on that day -- first off, did
7 you actually see the hydraulic workover unit fall
8 into the water?

9 A. No, sir.

10 Q. And I would imagine one of the emotions --

11 THE REPORTER: I'm sorry, was that a yes?

12 THE WITNESS: No, ma'am, I did not see it
13 fall over.

14 THE REPORTER: Okay.

15 BY MR. PARADOWSKI:

16 Q. Got it. Well, let's put that -- we'll put
17 what you saw and where you were at the time that
18 this happened aside for a second. I would imagine,
19 though, that when you learned that the hydraulic
20 workover unit tipped over and that Mr. Blanchard was
21 still attached to it, one of the emotions that you
22 experienced first was shock. Right?

23 A. Uh-huh, I would imagine.

24 Q. And don't want you to guess. And you tell
25 me if I get any of this stuff wrong, Mr. Rodrigue;